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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ACE AMERICAN INS. CO.,	)	Case No.: 23-cv-01261-RFB-DJA
	)	
Plaintiff,	)	APPLICATION TO EXTEND DEADLINE
	)	TO SERVE DEFENDANTS
v.	)	
	)	FIRST REQUEST
KATHERIN VALDES-GARCIA, et al.,	)	
	)	
Defendants.	)	

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Plaintiff ACE American Ins. Co. ("Plaintiff"), by and through counsel and pursuant to FRCP 4(m), hereby applies for an extension of approximately forty five (45) days to effectuate service on certain defendants. As discussed below, good cause exists to grant the extension.

This suit, an insurance coverage dispute arising from an accident involving a Hertz-owned rental car, seeks a determination regarding coverage given indications that the accident was staged and a product of fraud. Named in the suit are the following parties:

- Valdes-Garcia Hertz renter and Operator of Vehicle 1
- Julio Fernandez-Gonzalez Operator of Vehicle No. 2
- Jorge Hernandez Passenger in Vehicle 2

Service has been effectuated on Defendant Valdes-Garcia. A proof of service will be filed with this Court when received.

Difficulties have been encountered in locating Defendant Fernandez-Gonzalez and

Defendant Hernandez such that neither individual has been located. As a result, Plaintiff has retained an investigator to try and locate each individual via skip trace or an alternate method.

Per FRCP 4(m), plaintiffs are generally afforded ninety (90) days to effectuate service, subject to good cause for an extension. As this suit was filed on August 14, 2023, Plaintiff has been unable to timely serve either Fernandez-Gonzalez or Hernandez within the ninety (90) day timeframe despite best efforts.

Good cause exists to extend the deadline as Plaintiff has retained an investigator to actively seek to locate each individual. Within this additional timeframe, either service will have been effectuated on each of the remaining Defendants or Plaintiff will be in a position to request authority to serve each by publication.

Accordingly, for the reasons set forth herein, it is respectfully requested that the deadline to effectuate service be extended for approximately 45 days such that the deadline to complete service is extended to January 5, 2024.

Dated: November 20, 2023

MORALES FIERRO & REEVES

By: /s/ William C. Reeves  
 William C. Reeves  
 MORALES FIERRO & REEVES  
 Attorneys for Plaintiff

#### Supporting Memorandum

I, William Reeves, declare as follows:

1. I am an attorney with Morales Fierro & Reeves, counsel for Plaintiff in this matter.
2. I prepared the instant Application. The information contained herein is true and correct based on my own personal knowledge.
3. As noted herein, I have retained an investigator to actively seek to locate each individual. Within additional time, either service will have been effectuated on the remaining two defendants not yet served or I will be in a position to request authority from this Court to serve each by publication.

1 I declare that the foregoing is true and correct based on my own personal knowledge.

2 Executed in Walnut Creek, California on the date specified below.

3 Dated: November 20, 2023

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William C. Reeves

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**IT IS SO ORDERED.** Plaintiff shall have until January 5, 2024 within which  
to serve Defendant Fernandez-Gonzalez and Defendant Hernandez.


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DATED: 11/22/2023

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DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

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